

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

**CIVIL ACTION NO. 04-11578 PBS**

FIREMAN'S FUND INSURANCE COMPANY  
As Subrogee of Hodan Properties, Inc.,

Plaintiff

v.

FIRE SYSTEMS, INC., FIRE SUPPRESSION  
SYSTEMS OF NEW ENGLAND, INC., PRO  
CON, INC., and PAQUETTE ELECTRIC  
COMPANY, INC.

Defendants

**DEFENDANT PAQUETTE ELECTRIC COMPANY, INC.'S  
RULE 26 (A) (3) DISCLOSURE OF WITNESSES**

In addition to those identified by other parties whom Paquette Electric Company, Inc. may call, Paquette expects to call the following persons as witnesses:

1. Scott Duplisea  
27 Gem Drive  
Willimantic, CT  
(860) 208-7157
2. Michael Zurowski  
275 Ruestella Road  
Brooklyn, CT  
(860) 774-8855
3. James Parenteau  
Paquette Electric Company, Inc.  
368 Killingly Road  
Pomfret, CT 06350  
(860) 963-7078

4. Kevin Harrington  
Paquette Electric Company, Inc.  
368 Killingly Road  
Pomfret, CT 06350  
(860) 963-7078
5. Keeper of Records  
Town of Dartmouth  
Municipal Building  
400 Slocum Road  
Dartmouth, MA 02747  
(508) 910-1800
6. Elizabeth Smith  
15 Minot Street  
Wakefield, MA 01880  
(617) 523-2990
7. John McNamara  
71 Connecticut Avenue  
N. Dartmouth, MA 02747  
(508) 993-7642
8. David Bouchard  
Fire Casualty Assoc., Inc.  
P.O. Box 6664  
Providence, RI  
(401) 467-6014
9. Cory George Rogers  
169 Palmer Street  
New Bedford, MA
10. Charles Higgins  
3 Cook Street  
Douglas, MA  
(508) 476-2762
11. Jacinto M. Medeiros  
29 Pulaski Road  
(Chepachet) W. Gloucester, RI  
(401) 568-5669

12. David Lambert  
Paquette Electric Company, Inc.  
368 Killingly Road  
Pomfret, CT 06350  
(860) 963-7078
13. James Smart, P.E.  
42 Ridgebrook Drive  
Coventry, CT 06238  
(860) 742-4170
14. John Palmer  
52 Clark Mill Street  
Coventry, RI 02816

At this time, Paquette has no present intention to present testimony of any witness via transcript, other than brief excerpts of the Connecticut employees of Paquette and Rhode Island employees of Fire Systems, Inc. (FSI) and Fire Suppression Systems of New England, Inc. (FSSNE), if necessary and unavailable.

### **EXHIBITS**

In addition to those marked as exhibits at depositions and identified by the other parties, Paquette may offer the following exhibits into evidence at trial:

1. FSI November 20, 2002 report (Barrett Exhibit 3)
2. FSI January 16, 2003 report (Barrett Exhibit 5)
3. FSI Proposal and Contract (Barrett Exhibit 2)
4. TEC Control Systems January 16, 2003 job work order (January 13, 2006 Exhibit 2)
5. TEC Certificate of Completion (Rogers Exhibit 6)
6. Contractor's Material and Test Certificate for Dry Pipe System (Higgins Exhibit 6)
7. Weather data sheets (Klem Exhibit 14)

8. Alarm history and trouble history printouts from C. Barrett (January 13, 2006 Exhibit 4)
9. Copy of disk from C. Barrett
10. Edited disk
11. Edited alarm history printout
12. PCI Architecture project specifications, sections 15325, 15350 and 15315 (Klem Exhibits 16, 17, 20)
13. Dartmouth Fire District Pre-Fire Inspection Form (Rogers Exhibit 7)
14. Application for permit to perform electrical work (Rogers Exhibit 3)
15. Building permit field inspection sheets (Rogers Exhibit 4)
16. Applications and plans submitted to Town of Dartmouth regarding Paquette's work
17. Building permit (Higgins Exhibit 8)
18. June 14, 2001 building permit
19. Occupancy permit (Rogers Exhibit 5)
20. James Smart April 29, 2002 letter (Rogers Exhibit 8)
21. Charles Barrett October 6, 2003 letter (Klem Exhibit 3)
22. Chief McNamara calendar sheets for January 17, 2002, January 18, 2002, April 1, 2002, April 10, 2002, April 23, 2002, April 30, 2002
23. Potter PS10A pressure switch literature (Paquin Exhibit 3)
24. Potter PS40A high/low pressure switch literature (Paquin Exhibit 4)
25. Model 1000 test and drain (Paquin Exhibit 2)
26. Dry pipe valve literature (Paquin Exhibit 1)

27. FSI "tags" (January 13, 2006 Exhibit 3)
28. Diagrams of sprinkler system and dry pipe valve with alarm components
29. Sketch of valve and components (Higgins Exhibit 9)
30. Drawings (Zurowski Exhibit 2)
31. Electrician licenses of Paquette Electric Company, Inc. and John M. Paquette
32. Hodan September 3, 2003 release of Select Energy, et al.
33. Neil Watts' August 19, 2003 letter to D. Maxwell
34. ServiceMaster February 19, 2003 letter and invoice
35. Rogers' damage list (Rogers Exhibit 5)

Respectfully submitted,  
PAQUETTE ELECTRIC COMPANY, INC.  
By its Attorneys,

Date: August 23, 2006

s/ David D. Dowd, Esquire  
David D. Dowd, BBO#132660  
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Boston, MA 02108  
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**Certificate of Service**

I, David D. Dowd, hereby certify that I served a true and correct copy of the foregoing pleading electronically to:

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Date: August 23, 2006

s/ David D. Dowd, Esquire  
David D. Dowd